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Attorneys for Defendant FRONTIER AIRLINES, INC.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PETER DELVECCHIA, individually and as
next friend of A.D., a Minor,

Plaintiffs,

v.

FRONTIER AIRLINES, INC., SCOTT
WARREN, CHELSIE BRIGHT SAKURADA,
ANNA BOND, AMANDA NICKEL,
REX SHUPE and SHAWN MULLIN

Defendants.

Case No.: 2:19-cv-01322-KJD-DJA

**FRONTIER AIRLINES, INC.'S
OPPOSITION TO PLAINTIFFS'
MOTION FOR RELIEF FROM
PAGE LIMIT**

**DEFENDANT FRONTIER AIRLINES, INC.'S OPPOSITION
TO PLAINTIFFS' MOTION FOR RELIEF FROM PAGE LIMIT**

Defendant FRONTIER AIRLINES, INC. ("Frontier"), by its undersigned counsel, and for its
Opposition to Plaintiffs' Motion for Relief from Page Limit, states:

1 Plaintiffs' counsel uses his three-page motion, along with a thirteen-page declaration, as
 2 opportunity to add additional arguments in support of Plaintiffs' pending Motion to Compel (ECF No.
 3 77)¹. Rather than just simply stating his excuse for failing to comply with the page limitation, Plaintiffs'
 4 counsel further rehashes the arguments raised in his motion to compel (and previous motions) and seeks
 5 to portray Frontier in a negative light. *See* ECF 80-1 at ¶ 6-7. Plaintiffs are improperly using their
 6 motion and declaration to build on their already excessive motion to compel, and to further advance
 7 unfounded and dubious arguments. The inflammatory nature of Plaintiffs' motions lead Frontier to
 8 oppose the instant motion. Frontier strongly disagrees with Plaintiffs' counsel's disingenuous
 9 accusations and characterizations of Frontier and its counsel and requests that this Court deny Plaintiffs'
 10 Motion for Relief from Page Limit (ECF No. 80) and deny Plaintiffs' pending Motion to Compel (ECF
 11 No. 77) with prejudice.

14 WHEREFORE, Defendant, Frontier Airlines, Inc. requests that this Court deny Plaintiffs' Motion
 15 for Relief from Page Limit and Second Amended Motion for Compel in their entirety.

16 DATED this 27th day of April 2020

Respectfully submitted,

FRONTIER AIRLINES, INC.

/s/Matthew D. Martin

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¹ LR 7-3(c) limits motions for leave to file excess pages to 3 pages.

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CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2020, I caused the foregoing to be electronically filed with the United States District Court for the District of Nevada using the CM/ECF system.

/s/Matthew D. Martin